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BRIAN L. BANK

PARTNER

(516) 357-3516

brian.bank@rivkin.com

June 27, 2025

VIA ECF

Honorable Analisa Torres, U.S.D.J.

United States District Court for the Southern District of New York

500 Pearl Street

New York, New York 10007

**Re: Local 780 Cement Masons Pension Fund v. Quest Concrete Corp.
Docket No.: 25-cv-02098-AT (S.D.N.Y.)**

Dear Judge Torres:

This Firm represents Defendant Quest Concrete Corp. ("Defendant") in the above-referenced matter. I write with the consent of counsel for Plaintiffs to respectfully request extensions of several deadlines.

By way of update, counsel for Plaintiffs advised the Court on June 12, 2025 that "[t]he parties have made significant progress toward reaching an amicable resolution of this case and expect to finalize and execute a settlement agreement within the next two (2) weeks." D.E. 14. I am pleased to report that although the parties have not yet executed a settlement agreement, since that time the parties have continued to make significant progress toward resolution and anticipate finalizing a settlement within the next thirty (30) days.

The parties thus seek the following extensions in order to allow them to focus on finalizing their anticipated settlement:

- Defendant's deadline to answer, move against, or otherwise respond to the complaint from June 27, 2025 to **July 28, 2025**. This is the second request for an extension of this deadline, with the Court granting the sole prior request. See D.E. 12.
- The deadline for the parties to submit a joint letter and proposed Case Management Plan and Scheduling Order from June 27, 2025 to **July 28, 2025**. This is the third request for an extension of this deadline, with the Court granting the two prior requests. See D.E. 12, 15.
- The deadline for the parties to address the appointment of a magistrate judge, as per D.E. 7, from June 13, 2025 to **July 28, 2025**. This is the second request for an extension of this deadline, with the Court granting the sole prior request. See D.E. 12. (The parties inadvertently neglected to seek an extension of this deadline in their June 12, 2025 request.)

As noted above, counsel for Plaintiffs consents to these extension requests.



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The Court's time and attention to this request is appreciated.

Respectfully submitted,

RIVKIN RADLER LLP

/s/ Brian L. Bank

Barry I. Levy

cc: All counsel of record (via ECF)

4935-0020-2065, v. 1

GRANTED.

SO ORDERED.

Dated: June 30, 2025

New York, New York

A handwritten signature in black ink, appearing to be "Analisa Torres", written over a horizontal line.

ANALISA TORRES
United States District Judge